

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CLYDE E. MEASE, JR.,)	
)	
Plaintiff,)	
)	C.A. No. 06-271-SLR
v.)	
)	
WILMINGTON TRUST COMPANY)	Trial By Jury Demanded
)	
Defendant.)	

TO: Sheldon N. Sandler, Esquire
Young, Conaway, Stargatt & Taylor
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, DE 19899

NOTICE OF DEPOSITION DUCES TECUM¹

PLEASE TAKE NOTICE, that the undersigned will take the oral deposition of Tom Davidson on June 23, 2008, beginning at 10:00 a.m. at the offices of Aber, Goldlust, Baker & Over, located at 702 N. King Street, Suite 600, Wilmington, DE 19801.

ABER, GOLDLUST, BAKER & OVER

/s/ Gary W. Aber
GARY W. ABER (DSB #754)
702 King Street, Suite 600
P.O. Box 1675
Wilmington, DE 19899
302-472-4900
Attorney for Plaintiff

DATED: June 17, 2008

¹The deponent is to bring with him all documents listed on Exhibit "A", attached hereto.

EXHIBIT A

1. All documents or emails mentioning, relating to, or pertaining to complaints concerning Clyde Mease, forwarded to Tom Davidson for investigation.

2. All documents or emails mentioning, relating to, or pertaining to complaints concerning Clyde Mease, reviewed by Tom Davidson, for each of the complaints contained in any document in No. 1 above.

3. All documents or emails sent by Tom Davidson to any other person inquiring as to facts or circumstances surrounding the complaints, concerning Clyde Mease.

4. All documents or emails received by Tom Davidson from any other person concerning complaints as to Clyde Mease, other than those referred to in No. 1 above.

5. All documents or emails sent by Tom Davidson to any person concerning any preliminary findings, and responses thereto from any person concerning Clyde Mease.

6. All documents or emails which result in or constitute final reports and/or findings concerning complaints made about Clyde Mease.

7. All documents or emails sent to any person after the documents in No. 6 were written, containing information or relating facts or conclusions concerning the findings of Tom Davidson's investigation.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that two copies of the attached pleading was served via electronic mail on June 17, 2008 to the following counsel:

Sheldon N. Sandler, Esquire
Young, Conaway, Stargatt & Taylor
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, DE 19899

/s/ Melissa A. Chionchio
Melissa A. Chionchio
Secretary to Gary W. Aber, Esquire